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**R E C E I V E D**

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Writer's Direct Dial  
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September 29, 1993

**SUPERFUND PROGRAM  
MANAGEMENT BRANCH**

Marsha A. Adams, 5HSM-5J  
United States EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**BY FEDERAL EXPRESS**

Re: Response to the Information Request Concerning the  
Stickney Avenue Landfill and the Tyler Street  
Dump Site directed to Bulk Materials, Inc. ("BMI")

Dear Ms. Adams:

This letter is in response to the Information Request Pursuant to Section 104(e) of CERCLA for the Stickney Avenue Landfill and the Tyler Street Dump Site directed to Bulk Materials, Inc. ("BMI"), dated August 12, 1993 (hereinafter the "Information Request"). This response is submitted on behalf of Refiner's Transport and Terminal Corporation ("Refiners"), a wholly-owned subsidiary of BMI.

During the time period to which the Information Request is directed (1951 to 1981), Refiners operated, consecutively in time, two different truck terminals. From prior to 1951 until 1968, Refiners operated a truck terminal located at 2120 Front Street, Toledo, Ohio. After 1968, Refiners operated a truck terminal at Ohio Route 2 and Route 280 in Toledo, Ohio. This truck terminal located at Route 2 and Route 280 in Toledo, Ohio is still operated by Refiners.

Refiners was purchased by the Leaseway Transportation Corporation ("Leaseway") in May 1965. On February 28, 1989, Leaseway sold Refiners to BMI. Accordingly, document generated prior to February 28, 1989 may still be in the possession of Leaseway.

Refiners has conducted a diligent review of its records and has interviewed current and former employees who may have knowledge of the operations, hazardous substance use, storage, treatment, etc. of Refiners between 1951 and 1981. The affidavit required by the Information Request is attached.

In response to the Information Request, Refiners states as follows:

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1. Jack Golan, Vice President, Sales, BMI.  
2215 Navarre, Oregon, Ohio 43616  
Telephone no. 419-693-2828
2. Although Refiners conducted a review of its records, none were identified as responsive to the Information Request.
3. Additional documents concerning Refiners prior to February 28, 1989 may be in the possession of Leaseway Transportation Corp.
4. I.D. No. OHD000720102
5. Refiners has no specific knowledge of any individual who may have caused the release or threat of release of hazardous substances at the Stickney Avenue Landfill site or the Tyler Street Dump site.
6. Refiners engaged in washing the interior of bulk tank trailers at both the Front Street and Ohio Route 2 facilities in the time frame of 1951 to 1981. Washwater was placed into a settling tank filtered and ultimately discharged to the local sewer system. Periodically, sludge from the washwater settling tank was pumped out and shipped off-site for disposal. About 2 to 3 drums of sludge material was removed approximately 3 to 4 times a year. The company and/or individual who pumped out and hauled away the sludge material cannot be identified and no written contracts, invoices or manifests could be located in Refiners' files.

Refiners' bulk tank trucks hauled various materials, including a paint feedstock for DuPont, caustics, acids, resins, varnishes, lacquers, glues, formaldehyde, lubricating oils and asphalt.

Refiners does not know the ultimate disposition of its sludge material during the time frame 1951 to 1981.

7. Refiners responds to each subpart to Information Request No. 7 as follows:
  - (a) Others could not be identified.
  - (b) Dates of disposal could not be identified.
  - (c) See the general response to 6 above. No more detailed information is available.
  - (d) Refiners owned its waste sludge until it was accepted for disposal by the disposal company, who could not be identified.

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- (e) Each shipment consisted of approximately 2 to 3 drums (55 gallon capacity) of sludge material. The total quantity is unknown.
- (f) No test results could be located.
- (g) The waste disposal site was not selected by Refiners. Presumably, the disposal site was selected by the waste disposal company.
- (h) Approximately \$25 per drum was paid to the disposal company; however, no records exist to confirm this amount.
- (i) Refiners has no knowledge concerning where its waste disposal company intended to transport waste sludge material removed from Refiners' terminals.
- (j) Refiners has no knowledge concerning transshipment or storage of waste materials prior to final disposal.
- (k) Refiners has no knowledge concerning what was actually done to waste materials delivered to its waste hauler.
- (l) See response to 7(k) above.
- (m) See response to 7(k) above.
- (n) Waste sludge was transported in 55-gallon drums. These drums did not bear any markings from Refiners, but may have been marked by the waste hauler.
- (o) Refiners believes it paid a total of about \$25 to \$30 per drum of material removed by the waste hauler.
- (p) No responsive documents could be located.
- (q) Leaseway may have documents in its position relating to the time period prior to 1989.

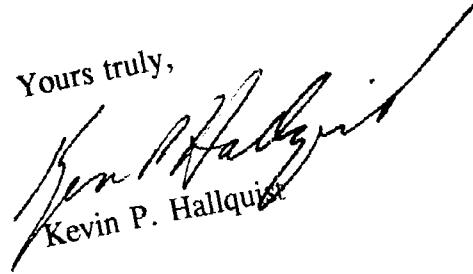
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8. Refiners has no knowledge concerning the ultimate disposal site of its waste sludge.  
Please contact me should you have additional requests concerning Refiners or

BMI.

Yours truly,



Kevin P. Hallquist

cc: Jacqueline Musacchia, Esq.

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**AFFIDAVIT**

STATE OF OHIO                    )  
                                      )  
COUNTY OF CUYAHOGA        )

I, Jack Gollan, being first sworn, do depose and state as follows:

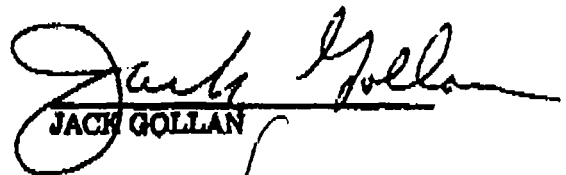
1. I am employed by Bulk Materials, Inc., the parent corporation of Refiners Transport & Terminal Corporation ("Refiners"), as Senior Vice President of National Accounts. I have been employed in that capacity since January, 1998.

2. Refiners has conducted a review of its records to locate any documents responsive to the U.S. Environmental Protection Agency's ("EPA") Request for Information ("Information Request") relating to the Stickney Avenue Landfill and the Tyler Street Dump Site. To the best of my knowledge all such responsive documents have been provided to the U.S. EPA by Refiners.

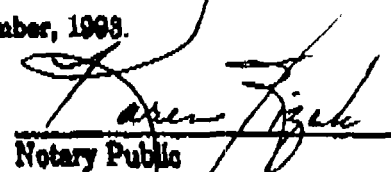
3. Refiners has diligently conducted an interview process of its current employees and former employees who may have knowledge of operations, chemical use and waste disposal practices responsive to the Information Request.

4. To the best of my knowledge, all information responsive to the Information Request has been forwarded to the U.S. EPA.

**FURTHER AFFIANT SAYETH NAUGHT.**

  
JACK GOLLAN

Sworn to and Subscribed before me this 29<sup>th</sup> day of September, 1998.

  
Notary Public

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